

EXHIBIT II

21-0108

Pharmacy Manual

DC Security



Purpose

To provide Health and Wellness Distribution Center (DC) associates procedural direction related to maintaining secure prescription product storage and processing areas and ensure alarm systems are employed as required.

Resources

Links	Resources
Procedures	
DC 07-105	Asset Protection Office Duties
DC 07-111	CCTV System Guidelines
DC 07-122	Logistic Identification Badges
	Emergency Procedure Manual
Items Needed	
	Criminal Background Checks Compliance and Training Guidelines
	Managers Contact List
	Controlled Substances Act CFR 21- Part 1300

Procedures

Access

Associates

All Health and Wellness DC associates gain access to the facility by utilizing an access control door located at the main exterior entry point. All other exterior doors must have contact alarm controlled, self-closing, self-locking mechanisms on the interior.

Visitors

No visitors are allowed in the DC unless escorted by a Walmart associate. DC associates visiting the DC off the clock can only access the office area, break room, or conference room. All visitors must sign in according to DC 07-105 Asset Protection Office Duties procedure.

Tours of any non-warehouse associate must have approval from the General Manager. General Manager (GM) should work with the Divisional Team on arrangements for any internal or external individual or team that requests a tour of the warehouse.

Drivers

OTR or 3rd party drivers have restricted entry through the driver door and must sign in following the DC 07-122 Logistic Identification Badge procedure. OTR or 3rd party drivers do not have access to the DC floor without a Walmart associate escort. No driver is allowed access to the Controlled Substance Storage Area.

Pharmacy DC

The Controlled Substance Storage Areas shall be accessible only to an absolute minimum number of specifically authorized associates. Unauthorized associates or visitors who pass through a Controlled Substance Area must have direct supervision and escort at all times. (CFR 21-1301.72 (d)). All

Unauthorized associates or visitors must sign in and out on appropriate log maintained at the cage/vault entrances.

Closed Caption Television (CCTV)

In accordance with DC 07-0111 CCTV System Guidelines procedure, the Health and Wellness DC is monitored inside and outside by CCTV. The Asset Protection Manager (APM) and GM determine camera locations in accordance with DC 07-111. Camera additions or deletions must be reviewed by Divisional Compliance, Safety, & AP Sr. Mgr. for approval through the CCTV Special Request process.

At a minimum, cameras must monitor the following areas:

- Parking Lot
- Parking Lot Entrance
- Associate Entrance
- Drivers Entrance
- Lobby/Main Entry Door
- Human Resources (HR) Window
- AP Office Window
- Money Handling Areas
- Controlled Pharmaceutical Cage/Vault Stocking Area
- Controlled Pharmaceutical Cage/Vault Picking Area
- Controlled Pharmaceutical Cage/Vault Verifying Stations
- Controlled Pharmaceutical Cage/Vault Cutting Stations
- Vault Entrance/Exit Doors
- Receiving Inside/Outside Dock
- Shipping Inside/Outside Dock
- Systems/Data Processing Entry Door and Office
- Hazardous Waste Drum and Cage Entrance
- Quarantine Areas
- Flip Top Dumpsters

Asset Protection (AP) conducts weekly camera shot review and logs all camera shots on the CCTV log located in the CCTV book. Any defective camera shots are documented on the log and the APM is responsible for reviewing at least weekly. The APM will enter a Special Request for repair/replacement of any defective camera shot. All Special Requests are sent to the Divisional Compliance, Safety & AP Sr. Mgr. for approval.

Video review request as part of any DC internal investigation is approved by the APM. If the APM is not available, Asset Protection Associate (APA) notifies the GM and Divisional Compliance, Safety & AP Sr. Mgr. for direction. The video library must be maintained for a minimum of 30 days.

Hindering, tampering with, or otherwise compromising any CCTV equipment may result in disciplinary action, up to and including termination.

Security Alarm System

All DC's are equipped with an alarm system that includes:

- Contact breakers
- Panic alarms

Pharmacy DC's are equipped with additional systems that include:

- Motion Sensors
- Seismometers

Alarm Central (479-272-4600) monitors these alarms 24/7. During normal business hours, Alarm Central calls the DC if it receives an alarm. AP will assess any alarm and respond as outlined in the Emergency

Manual to address root cause of the alarm. During off-hours, Alarm Central handles notification based on the Managers Contact List on file. The APM must keep the Managers Contact List updated.

All controlled substance cage/vault are equipped with an alarm system, which Alarm Central monitors. All controlled substance cages are armed when not in use, even during normal business hours.

All managers and AP associates must make sure the Pharmacy DC is armed and secured at the end of the business day. The Optical DC is secured any time it is closed. Any violation of these security procedures may result in disciplinary action up to and including termination.

Control Cage/Vault Access

Only authorized associates are allowed to enter the control cage/vault unaccompanied. The GM and APM partner to determine appropriate authorized associates. A list of all authorized individuals must be posted outside the control cage/vault. The listed associates are the only associates given authority in the access control system that AP maintains.

Important!

Those not authorized to enter the control cage/vault unaccompanied can only enter with an authorized associate and must sign the Cage/Vault Visitor Log located at the entrance of the controlled area.

Vault Door Combination Lock

The combination lock shall be limited to a minimum number of associates. Associates approved to have the combination are the AP Manager(s), GM, and opening Operations Manager only. Any other associate must be approved by the Compliance, Safety, & AP Sr. Mgr. & Sr. Director. Only the AP Managers will have the combination lock instructions. The instructions for setting or changing the combination must be locked in the APM Office cabinet.

Off-Hours Access

Access to the Health and Wellness DC's during off-hours is limited to either of the following:

- Two members of management.
- One member of management and a member of AP.

Exception: Managers or AP associates responding to an alarm during off-hours. In most cases, local law enforcement will be on site.

Exception: If a Pharmacy DC has an office area separate from the drug storage and processing area, managers can access their office area without another manager or AP associate present. Managers may not enter the GM, APM, or HRM Office at any time without proper approvals and can only enter HRM Office with an APA.

Background Checks/Drug Screen

Perform a criminal background check and drug screen on all new and transfer Pharmacy DC associates. Human Resource Manager will provide the required materials for completing the Criminal Background Checks Compliance and Training Guidelines. The new or transferred associate cannot start until a competitive background check is received.